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Attorney for *Defendant Robert A. Bisom*

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN MARIANA ISLANDS

ROBERT D. BRADSHAW,

Plaintiff,

vs.

COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
GENERAL, PAMELA BROWN, ROBERT
BISOM and JAY H. SORENSEN,

Defendants.

CASE NO. CV 05-00027

DEFENDANT ROBERT A.
BISOM'S
CASE MANAGEMENT
CONFERENCE STATEMENT

Date: Monday, January 22, 2007
Time: 8:30 a.m.
Judge: Hon. Alex R. Munson

COMES NOW, Defendant ROBERT A. BISOM, by and through his attorney,
pursuant to LR 16.2CJ(e)(2) with the following Case Management Conference Statement:

A. Service of process on parties not yet served

1. Not waiving any appealable issues, it appears that all parties have been served.

B. Jurisdiction and Venue

1. As stated in his answer, Defendant Bisom does not believe that this Court has
subject jurisdiction in this matter over the claims against Defendant Bisom.

2. Notwithstanding the Court's prior decision regarding service on Defendant Bisom,
Defendant Bisom does not believe the Court has personal jurisdiction over him.

3. Defendant Bisom does not contest the venue in this matter.

1 **C. Track assignment**

2 Plaintiff recommends a Standard Track assignment.

3 **REASONS:**

4 1. There a substantial number of legal issues in this case, although Defendant Bisom
5 believes that they are all of settled issues of law. There will be extensive briefing of the issues
6 in substantive motions, but the facts, and therefore the necessary discovery, in this matter are
7 fairly limited.

8 2. There are several real parties in interest.

9 3. Defendant Bisom does not expect the need for very many fact witnesses.

10 4. Defendant Bisom does not at this time anticipate the need for expert witnesses to
11 support any of his defenses in this matter.

12 5. Given the various claims of Plaintiff, and depending upon the outcome of pre-trial
13 motions, the jury trial in this case could take two weeks or more.

14 6. This case appears to have little suitability for alternative dispute resolution.

15 7. The character and nature of Plaintiff's claims here are far from routine. However,
16 it is highly unlikely that any damages would need experts to establish.

17 **D. Anticipated motions**

18 1. Motion(s) for Summary Judgment;

19 2. Motions for Protective Orders; and

20 3. Motions *In Limine*.

21 **E. Discovery**

22 **Anticipated discovery:**

23 1. Interrogatories to and from all defendants;

24 2. Requests for production of documents to and from all defendants;

25 3. Requests for Admissions to and from all defendants;

26 4. Depositions: Possibly a deposition of the Plaintiff.

27 5. **Limitations on discovery:** Possibly limits on the time, place and manner of
28

1 depositions.

2 **F. Further proceedings.** See Section K below.

3 **G. Special procedures.**

4 With the exception of possible procedures related to the taking of depositions, no
5 special procedures are anticipated at this time.

6 **H. Modifications of standard pre-trial procedures.**

7 No modifications are requested at this time, although Defendant Bisom foresees a
8 possible need to establish some limits on where and how depositions will be conducted in this
9 case and who will be obligated to pay the costs of travel to and from various deposition sites.

10 **I. Settlement prospects**

11 Given the history of this dispute, the nature of Plaintiff's claims, and the pending
12 litigation in other courts, it is relatively unlikely that this matter will settle.

13 **J. Other matters**

14 ISSUES: Defendant Bisom has raised several affirmative defenses and takes issue with
15 all of Plaintiff's causes of action, factual assertions and supposed legal theories. All such issues
16 will be the subject of future motions and memoranda related thereto.

17 **K. Setting of dates**

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|----|--------------------------------------|--------------------|
| 18 | 1. Joinder of all parties: | April 27, 2007 |
| 19 | 2. Motions to amend: | April 27, 2007 |
| 20 | 3. Discovery service cut-off: | August 10, 2007 |
| 21 | 4. Discovery motions cut-off date: | September 13, 2007 |
| 22 | 5. Status/settlement conference: | September 17, 2007 |
| 23 | 6. Status/settlement conference: | October 15, 2007 |
| 24 | 7. Dispositive motions cut-off date: | October 12, 2007 |
| 25 | 8. Joint pretrial order: | November 22, 2007 |
| 26 | 9. Final pretrial conference: | November 26, 2007 |
| 27 | 10. Trial: | December 3, 2007 |
| 28 | | |

1
2 DATED this 17th day of January, 2007.
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4

5 /s/ Mark B. Hanson

6 MARK B. HANSON

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14 Attorney for *Defendant Robert A. Bisom*
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CERTIFICATE OF SERVICE

I hereby certify that this day a copy of the foregoing was deposited in the United States Post Office, first class mail, postage prepaid, addressed to the following:

Robert D. Bradshaw, Plaintiff *pro se*
P.O. Box 473
1530 W. Trout Creek Road
Calder, Idaho 83808

Jay H. Sorensen, Esq.
c/o Shanghai
Post Office Box 9022
Warren, MI 48090-9022

I further certify that the following were served with a copy of the foregoing via the Court's electronic case filing system:

Gregory Baka, Assistant Attorney General
Office of the Attorney General
Civil Division—Capitol Hill
Second Floor, Juan A. Sablan Memorial Building
Caller Box 10007
Saipan, MP 96950

DATED: January 17, 2007

/s/ Mark B. Hanson

MARK B. HANSON